

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ADAM BEKELE

Defendant.

FILED UNDER SEAL

Case No. 1:23-mj-233

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Carl Swanson, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Postal Inspector for the United States Postal Inspection Service (“USPIS”), assigned to the Washington Division and currently stationed in Merrifield, Virginia. I have held this position since April 2021. My regular responsibilities as a Postal Inspector include conducting investigations involving postal crimes and related violations of the federal code such as mail theft, mail fraud, wire fraud, aggravated identity theft, and access device fraud. Prior to my role with the Postal Inspection Service, from January 2009 through April of 2021, I was a Special Agent with the United States Secret Service and the Criminal Investigation Division of the Environmental Protection Agency. In those roles, I investigated multiple types of violations of federal law, including wire fraud, bank fraud, identify theft, access device fraud, and federal violations pertaining to the environment.

2. I am submitting this affidavit in support of a criminal complaint and arrest warrant charging the defendant, Adam BEKELE (“BEKELE”)(year of birth, 1990) with unlawful use of a

mail lock key in violation of 18 U.S.C. § 1704 and theft of or receipt of stolen mail in violation of 18 U.S.C. § 1708. More specifically, there is probable cause to believe that BEKELE, without authorization, used what is known among postal personal as an “Arrow Key” to access postal collection blue boxes located at the West Springfield Post Office, 6200 Rolling Road, Springfield, VA 22152, on at least three occasions. Because “Arrow Keys” are specialized general access keys capable of opening many different postal boxes,¹ they are often stolen or fraudulently obtained by those who want to steal mail.

3. As described more fully below, I have obtained evidence indicating that BEKELE used an Arrow Key, or a counterfeit equivalent, to gain access to a particular postal collection blue box. He has stolen from this box on at least three occasions.

4. The facts contained in this affidavit come from my personal observations and knowledge, my review of documents and other evidence, my training and experience, and information obtained from other agents, police officers involved in this investigation, and witnesses. All observations that were not made personally by me were related to me by persons with knowledge of this investigation whom I deem to be credible. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not set forth all of my, or the Government’s knowledge about this matter.

PROBABLE CAUSE

5. Based on an increase of mail theft complaints stemming from the West Springfield Post Office, investigators increased surveillance on mailboxes. Investigators determined that at

¹ When used lawfully, arrow keys are essential to conducting USPS business. They are serialized and logged daily within the appropriate delivery unit or post office. USPS carriers and clerks are required to sign out and sign in USPS Arrow keys whenever they are used. At no time is any USPS employee or other person to have possession of a USPS Arrow key other than during working hours, on official USPS business, and only after completing the USPS Arrow key log with USPS management.

least one key which would be capable of opening the blue boxes located at the Post Office had been reported as lost or stolen and not recovered in the past. Your affiant determined that particular boxes at the Post Office were the likely target of mail thieves, and therefore established remote surveillance of them using video cameras and a license plate reader. I also installed a specialized camera that would only activate to take a still shot if the Arrow Key slot was used to open the box.

6. On Monday, August 21, 2023, at approximately 4:42 a.m., a suspect, later identified as BEKELE, appeared in a photograph from just such a camera installed on the inside of a mailbox located in West Springfield in the Eastern District of Virginia, 6200 Rolling Road, Springfield, Virginia, 22152. Again, to activate the surveillance, BEKELE would have had to open the blue box using a USPS Arrow key or counterfeit key:



7. I later obtained footage from Sunday, October 1, 2023, at approximately 5:45 a.m. which appeared to depict the same person. In this instance I had obtained surveillance footage from the same West Springfield Post Office USPS jumbo box using a color video camera and license plate reader. The surveillance showed a 2012 Ford four door sedan bearing VA License

plate TUE-XXXX.² In the video footage, the suspect used a key to enter the blue box, reached in and removed numerous mail pieces, then placed them in the back seat of the sedan before closing the blue box and departing.³



8. On Monday, October 2, 2023, using the plate number, your affiant identified the Ford sedan as a rental car belonging to Rental Car Company-1. I was able to determine that the Ford sedan was rented by BEKELE. According to a Rental Car Company-1 representative, BEKELE provided his VA Driver's License to rent the car. According to the representations of the Rental Car Company-1 agent and my review of the rental agreement on file, BEKELE began the rental on September 19, 2023 and was still in possession of the car.

9. Law enforcement obtained an Arlington County police booking photograph of BEKELE from August 2021. Your affiant compared the image taken from the surveillance photo from the theft on August 21, 2023, and the Arlington County booking photo from August of 2021. The two photographs are depicted below:

² The exact license plate numbers have been redacted throughout this affidavit with the use of XX to represent numbers.

³ On October 2, 2023 I examined the blue box in question and noted that there was no damage or evidence of the lock or cabinet being opened by force.

10. Your affiant confirmed that BEKELE does not work for USPS, and therefore did not have any legal reason to possess a USPS Arrow Key.

11. On October 4, 2023, a representative from Rental Car Company-1 called and advised that BEKELE had returned the Ford sedan and ended his rental agreement. The following day, I responded to the Rental Car Company-1 office in Virginia. I confirmed the Ford sedan rented by BEKELE had the same Virginia license plate seen in the surveillance photo taken at the same time of the mail theft. Further, I noticed a missing or damaged gas cap cover, which I believe to be consistent with damage to the vehicle BEKELE is seen exiting, and into which he placed stolen mail, on October 1, 2023, as seen on the surveillance video from the October 1, 2023 mail theft. The Rental Car Company-1 representative also provided a printout containing the latitude and longitude location history of the rental car. That data showed that the rental car was parked consistently in the vicinity of 56XX Eastbourne Drive, Springfield, VA 22151.⁴

12. I later reviewed surveillance footage from October 20, 2023, at approximately 2:35 a.m., which I also believe shows BEKELE unlawfully using an arrow key and stealing mail. In that footage, a black Ford Taurus sedan bearing Virginia tag TRI-XXXX (as captured by a license plate reader) pulls up to the same West Springfield blue box which BEKELE had previously robbed on August 21, 2023 and October 1, 2023. Then BEKELE, wearing what appears to be similar or the same clothing that he wore during the previous mail theft, exited the

⁴ The GPS associated with the rental car did not reveal that the rental car was at the mailbox. This is because the device was not on all the time, but only activated when certain parameters were met, e.g., high speed. Data for location of the car was also requested by the rental car company itself on several occasions after BEKELE had not paid a bill for the rental.

sedan, and in much the same way he did in previous surveillance footage, approaches the blue box and uses a key to open it. On the footage he removes the two mail bins from inside and proceeds to dump them into the back seat of the Ford Taurus sedan.



13. On October 20, 2023, at approximately 9:00 a.m. (approximately 6 ½ hours after the surveillance footage was taken), your affiant observed the Ford Taurus bearing the same VA tag described above parked on the street in front of 56XX Eastbourne Drive, consistent with the reported common latitude longitude location of the rental car that was utilized during the October 2, 2023 theft.

CONCLUSION

14. I respectfully submit that the foregoing facts established in this affidavit demonstrate probable cause that Adam BEKELE used a stolen USPS key or counterfeit key to access a USPS blue box located at the West Springfield Post Office and stole mail in violation of

18 U.S.C. § 1708 and 18 U.S.C. § 1704. Accordingly, I respectfully request that the Court issue the proposed criminal complaint and arrest warrant.

Respectfully submitted,

Carl Swanson

Carl Swanson
Postal Inspector
United States Postal Inspection Service

Attested to by the applicant in accordance
With the requirements of Fed. R. Crim. P. 41
via telephone on November 3, 2023.



Digitally signed by Ivan Davis
Date: 2023.11.03 15:08:26 -04'00'

Honorable Ivan D. Davis
United States Magistrate Judge